

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TENNESSEE
SOUTHERN DIVISION

IN RE:

BETTY SUE HOWARD

Debtor(s)

CASE NO. 13-11877

CHAPTER 13

CREDITOR:

Bank of America

OBJECTION TO CONFIRMATION

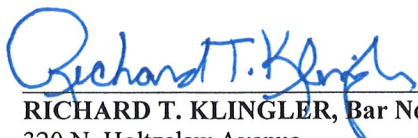
Creditor objects to confirmation upon the following grounds:

- ☒ 1. Creditor does not have adequate protection.
- ☒ 2. Creditor's security has been improperly valued.
- ☐ 3. Security is worth more than claim. Plan doesn't provide for interest or other charges, or provides insufficient interest.
- ☐ 4. Unsecured claims are divided into classes without rational basis, and/or discriminates unfairly against a class.
- ☒ 5. Security interest in home is modified or default not cured within a reasonable time.
- ☐ 6. The plan was modified without proper notice.
- ☐ 7. Plan isn't in good faith and/or is not best fair effort.
- ☐ 8. Payment in excess of that in Chapter 7 not provided.
- ☒ 9. Creditor has a secured claim and hasn't accepted plan.
- ☐ 10. Insufficient time to specify grounds, and other.

Creditor prays for a hearing, for appropriate orders, and for notice and opportunity to be heard on any and all matters, proceedings or others in this case.

Respectfully submitted,

KENNEDY, KOONTZ & FARINASH



RICHARD T. KLINGLER, Bar No. 006594

320 N. Holtzclaw Avenue

Chattanooga, Tennessee 37404

(423) 622-4535

ATTORNEYS FOR Bank of America

CERTIFICATE OF SERVICE

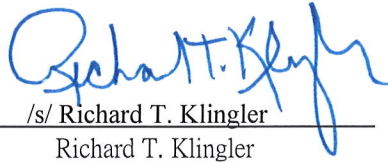
The undersigned does hereby certify that a copy of the foregoing document been sent by electronic mail to those shown on the Notice of Electronic Filing receipt issued by the Clerk of Court and/or by placing a copy of the same in the United States First Class Mail with sufficient postage to insure delivery to its destination on the following:

U.S. Trustee
31 E. 11th Street, 4th Floor
Chattanooga, TN 37402

C. Kenneth Still
P.O. Box 511
Chattanooga, TN 37401

Richard L. Banks
393 Broad Street N.W.
Cleveland, TN 37311

Dated: May 13, 2013.



/s/ Richard T. Klingler
Richard T. Klingler